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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO SEAL
JOINT LETTER BRIEF RE: LOG
PRESERVATION**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s
7 Administrative Motion to Seal portions of the parties’ Joint Letter Brief Regarding Log Preservation
8 (“Joint Letter Brief”). In making this request, Google has carefully considered the relevant legal
9 standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this request
10 with the good faith belief that the information sought to be sealed consists of Google’s confidential
11 information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Joint
13 Letter Brief, attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential
15 technical information regarding the operation of Google’s products, including the various types of
16 logs maintained by Google, the size of those logs, which logs are linked to a user’s Google Account,
17 and the cost in money and man-hours for suspending retention periods for those logs, that Google
18 maintains as confidential in the ordinary course of its business and is not generally known to the
19 public or Google’s competitors.

20 5. Such confidential information reveals Google’s internal strategy, system design, and
21 system capacity regarding various important products, and falls within the protected scope of the
22 Protective Order entered in this action. *See* Dkt. 81 at 2-3.

23 6. Public disclosure of such confidential information could affect Google’s competitive
24 standing as competitors may alter their log data system designs and practices relating to competing
25 products. It may also place Google at an increased risk of cyber security threats, as third parties may
26 seek to use the information to compromise Google’s log data preservation system.

27 7. For these reasons, Google respectfully requests that the Court order the Joint Letter
28 Brief to be filed under seal.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in Los Angeles, California on March 23, 2021.

3
4 DATED: March 23, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

5
6
7 By 

Viola Trebicka

Attorney for Defendant